



South Coast
Air Quality Management District

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FAXED: AUGUST 8, 2007

August 8, 2007

Mr. Richard Ayala
City of Ontario
Planning Division
303 East "B" Street
Ontario, CA 91764

Dear Mr. Ayala:

Draft Subsequent Environmental Impact Report (DSEIR)
Ontario Wal-Mart Supercenter
(June 2007)

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated in the Final Subsequent Environmental Impact Report.

Pursuant to Public Resources Code Section 21092.5, please provide the SCAQMD with written responses to all comments contained herein prior to the certification of the Final Subsequent Environmental Impact Report. The SCAQMD would be available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact James Koizumi, Air Quality Specialist – CEQA Section, at (909) 396-3234 if you have any questions regarding these comments.

Sincerely

Steve Smith., Ph.D.
Program Supervisor
Planning, Rule Development & Area Sources

Attachment

SS: JK:CB

SBC070626-09
Control Number

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1. Off-Site Infrastructure Improvement Emissions

On page 17 of the “Air Quality Impacts Analysis,” the lead agency indicates that several off-site infrastructure improvement projects are planned that will likely occur during the building erection phase. Although the lead agency does not calculate construction emissions for the off-site improvements, it concludes that because later phase construction emissions are less than the SCAQMD’s recommended significance thresholds and, because of the physical distance separating the off-site improvements and on-site construction emissions, the project “may be able to accommodate off-site improvements without exceeding those thresholds.” Without quantifying the off-site construction emissions, the lead agency has not demonstrated that on-site and off-site construction emissions do not exceed any of the applicable regional significance thresholds. For determining regional significance, distance between emission sources is unimportant.

Further, depending on the location of the off-site improvement construction, emissions from the off-site equipment have the potential to exceed the localized significance thresholds. As a result, the SCAQMD requests that off-site improvement construction emissions be calculated. Once calculated, these emissions should be added to the appropriate phase on-site construction emissions and then compared to the regional significance thresholds. Similarly, the appropriate off-site construction emissions should also be compared to the appropriate localized significance thresholds.

2. CO Hotspots Analysis

- EMFAC2002 emission factors were used for the CO hotspots analysis. EMFAC2007 emission factors were used for the HRA for the same project according to hard copy files provided by the lead agency’s air quality consultant. EMFAC2007 emission factors have been available since November 2006 and should be used for all current and future projects.
- In the SCAQMD’s 10/27/06 comment letter on the NOP/IS for the proposed project, the SCAQMD requested that electronic versions of all air quality modeling and HRA files be submitted to the SCAQMD along with the DSEIR. Detailed calculations and documentation in electronic format were not provided as requested by SCAQMD staff. Based on the hard copy CO protocol sent by the lead agency’s air quality consultant, it appears that the BAAQMD CO hotspots analysis protocol for receptors

25 feet away from the intersection of two six-lane roads was used. Because the requested support documentation was not provided, the receptor distance and road type could not be verified. It appears that the consultant used the 25-foot receptor distance, however, since roadways typically have sidewalks, the “at edge” receptor distance should be used instead of the 25-foot distance; unless it can be demonstrated and documented that receptors would not be closer than 25 feet from the roadway.

3. **Health Risk Assessment (HRA)**

- Although documentation was not provided to SCAQMD staff, it appears that the emission factors for the detailed HRA were developed similarly to those in the screening level HRA. SCAQMD staff requested electronic data twice. The first request was made on July 13, 2007 to Mr. Ayala. In response to this request, the lead agency’s air quality consultant provided hard copies of the weighted emission factors but, the complete documentation was not provided. A second request was made on July 24, 2007 to the lead agency’s consultant, which was not answered. As a result, neither electronic nor hard copy documentation were provided to SCAQMD, so SCAQMD staff had to re-run the EMFAC model to verify the results, which can be very labor intensive and, therefore, time consuming. It is for these reasons that the SCAQMD requests the electronic files for all HRAs and air quality modeling results.

In an effort to evaluate the HRA, SCAQMD staff generated emission factors and emission calculations based on general assumptions contained in the DSEIR to verify emission factors provided by the air quality consultant. Neither the EMFAC2007 emissions factors nor the emissions could be completely duplicated. EMFAC2007 maneuvering emission factors were reported in the HRA as grams per hour; however, EMFAC2007 generates maneuvering emission factors in grams per mile. A conversion calculation was never provided. The emissions generated for LD1, LD2 are slightly different and could not be reproduced based on using emissions from whole truck trips.

4. **URBEMIS 2007**

The lead agency should be aware that URBEMIS 2007 is now available and should be used for future air quality analysis instead of URBEMIS 2002. Since the CEQA document for the proposed project was circulated for public review before URBEMIS 2007 became available in June 2007, use of URBEMIS 2002 is acceptable for this project.